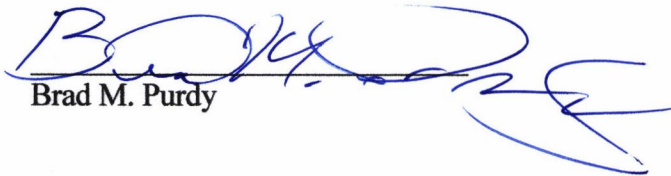


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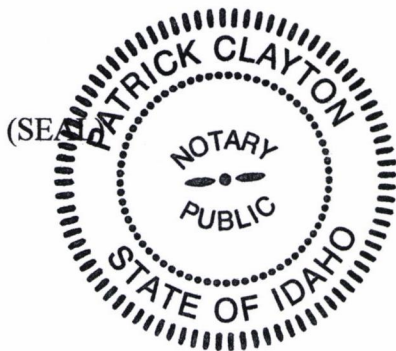
5. That attached to this Affidavit as Exhibit "D" is an email received by Affiant from Ms. Kaley McNay on May 29, 2013.
6. That attached to this Affidavit as Exhibit "E" is the Word document attached to Exhibit D.

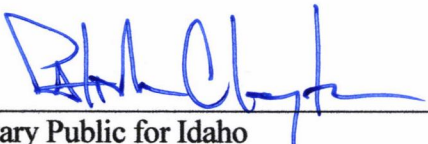
FURTHER your affiant saith not.

DATED this 30TH day of July, 2013.


Brad M. Purdy

SUBSCRIBED AND SWORN TO before me this 30th day of July, 2013.




Notary Public for Idaho
Residing at Boise, Ada County, Idaho
My Commission expires: 4/17/2018

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 30th day of July, 2013, I served a copy of the foregoing document on the following by electronic mail and U.S. Postage, first class.

Ted Weston
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
ted.weston@pacificorp.com

Daniel E. Solander
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
daniel.solander@pacificorp.com

Electronic Service Only:
Data Request Response Center
PacifiCorp
datarequest@pacificorp.com

Neil Price
Deputy Attorney General
Idaho Public Utilities Commission
472 W, Washington (83702)
PO Box 83720
Boise, ID 83720-0074
neil.price@puc.idaho.gov

Randall C. Budge
Racine, Olson, Nyc, Budge & Bailey
201 E. Center
PO Box 1391
Pocatello, ID 83204-1391
E-Mail: rcb@racinelaw.net

Brubaker & Associates
16690 Swingley Ridge Rd., #140
Chesterfield, MO 63017
bcollins@consultbai.com

James R. Smith
Monsanto Company
P.O. Box 816
Soda Springs, ID 83276
Jim.r.smith@monsanto.com

Eric L. Olsen
ASSOCIATION, INC: Racine, Olson, Nye, Budge & Bailey
(Exhibit Nos. 30 1-400) 201 E. Center
P0 Box 1391
Pocatello, ID 83204-1391
elo@racinelaw.net

Anthony Yankel
29814 Lake Road
Bay Village, OH 44140
tony@.yankel.net

Benjamin J. Otto
Idaho Conservation League
710 N. 6th St.
Boise, ID 83702
botto@idahoconservation.org

Ronald Williams
Williams Bradbury, P.C.
1015 W. Hays St.
Boise, ID 83702
ron@williamsbradbury.com

Don Schoenbeck
RCS, Inc.
900 Washington St., Suite 780
Vancouver, WA 98660
dws@r-c-s-inc.com

Tim Buller
Agrium, Inc.
3010 Conda Rd.
Soda Springs, ID 83276
TBuller@agrium.com

Ken Miller
Snake River Alliance
Box 1731
Boise, ID 83701
E-Mail: kmiller@snalteriveralliance.org

Brad M. Purdy

EXHIBIT A

Case PAC-E-13-04: CAPAI Discovery

From: **brad purdy** (bmpurdy@hotmail.com)
Sent: Mon 4/29/13 4:13 PM
To: Ted Weston (ted.weston@pacificorp.com)
1 attachment
CAPAI Discovery.docx (13.8 KB)

Hi Ted: Per our phone call earlier today, I am attaching via a Word doc, CAPAI's discovery requests in the above-referenced case. You agreed that it makes sense for all parties to submit their discovery requests directly to you and informally via email to expedite the Company's ability to respond to same, ideally prior to this Thursday's second settlement conference. Given the nature of CAPAI's discovery, it is possibly not possible for you to provide a response that quickly, but it will give you an idea of what issues and information my client is potentially interested in raising and delving into. Please do not hesitate to contact me should you have any questions or suggestions on how to provide the requested information as easily and expeditiously as possible. Thanks Ted. bp

Brad M. Purdy Attorney at Law
2019 N. 17th St.
Boise, ID 83702
208-384-1299 Land
208-484-9980 Cell
208-384-8511 Fax
bmpurdy@hotmail.com

TO: TED WESTON
FROM: BRAD PURDY
DATE: April 29, 2013
Re: Case PAC-E-13-04: CAPAI Discovery Requests

1. How many of Rocky Mountain Power's (RMP's) Idaho Residential class customers received LIHEAP benefits during the test year for which the general rate case application, if filed in this proceeding, will be based upon? Please note that in all subsequent discovery where the term "test year" is found is to be defined identically to that stated in this request.
2. How many of RMP's Idaho Residential class customers received benefits under the Company's Low-Income Weatherization (LIWA) program?
3. Please calculate the total number of RMP customers who receive either LIHEAP or LIWA benefits during the test year. In making this calculation, please count customers who receive both LIHEAP and LIWA only once (hereinafter referred to as RMP's "low-income customer proxy group").
4. Please provide the actual monthly consumption during the test year of all customers included in the low-income proxy group.
5. Please provide the actual monthly consumption during the test year of the Company's Residential class customers excluding those customers included in the low-income proxy group.
6. Using the Company's low-income proxy group, and based on actual monthly test year data as referred to in Request No.4, please make the following rate design model runs:
 - a. Calculate the effects on the low-income customer proxy group's monthly bills if the Company's monthly basic charge were increased from its current level to \$10, \$15 and to \$20, (assuming no changes to the existing commodity rates for the Residential class's two-tiered rate). In responding to this request, please make the requested calculations at existing rates during the test year.
 - b. Assuming no change to the Company's existing monthly basic charge, calculate the effects on the low-income proxy groups' monthly bills in comparison to non-low income residential customers (using test year actual monthly consumption) if the existing two-tiered rate design is changed such that the consumption amount of the first tier is increased from the existing 700 kWh summer block to 800 kWh/month, 1000 kWh and 1200 kWh. Please provide the same data for the winter block of 1000 kWh if the block were changed to 800 kWh, 1200 kWh and 1400 kWh.

EXHIBIT C

Fwd: Responses for Brad Purdy

From: **Weston, Ted** (Ted.Weston@pacificorp.com) You moved this message to its current location.

Sent: Thu 5/02/13 8:37 AM

To: **Brad M. Purdy** (bmpurdy@hotmail.com)

5 attachments

CAPAI 5.doc (43.5 KB) , CAPAI 1.doc (35.0 KB) , CAPAI 2.doc (35.0 KB) ,
CAPAI 3.doc (35.0 KB) , CAPAI 4.doc (45.5 KB)

Brad

Attached are responses 1-5 question 6 will take sometime. See you later this morning.

Ted Weston

Sent from my Verizon Wireless 4G LTE Smartphone

----- Forwarded message -----

From: "Bell, Barry" <Barry.Bell@pacificorp.com>

To: "Weston, Ted" <Ted.Weston@pacificorp.com>, "Solander, Daniel"
<Daniel.Solander@pacificorp.com>

Subject: Responses for Brad Purdy

Date: Wed, May 1, 2013 5:41 PM

Ted and Daniel: Attached are responses to CAPAI 1-5 for Brad Purdy. Please review and if you're okay with them, please provide directly to Brad at settlement tomorrow. The documents are locked. If you see something that needs to be changed, please e-mail me; I'll change and send back to you. Otherwise you can provide responses to Brad as is, including forwarding to him electronically.

ID PAC-E-13-04 Rocky Mountain Power's Response to CAPAI 6

EXHIBIT D

From: **McNay, Kaley** (Kaley.McNay@pacificorp.com) You moved this message to its current location.

Sent: **Wed 5/29/13 11:45 AM**

To: 'Randy Budge' (rcb@racinelaw.net);
'bcollins@consultbai.com' (bcollins@consultbai.com);
'gkajander@consultbai.com' (gkajander@consultbai.com);
'jim.r.smith@monsanto.com' (jim.r.smith@monsanto.com);
'robert.l.geddes@monsanto.com' (robert.l.geddes@monsanto.com); Price, Neil (ID PUC) (neil.price@puc.idaho.gov); tony@yankel.net (tony@yankel.net); 'dws@r-c-s-inc.com' (dws@r-c-s-inc.com); ron@williamsbradbury.com (ron@williamsbradbury.com); tbuller@agrium.com (tbuller@agrium.com); bmpurdy@hotmail.com (bmpurdy@hotmail.com); botto@idahoconservation.org (botto@idahoconservation.org); kmiller@snakeriveralliance.org (kmiller@snakeriveralliance.org); elo@racinelaw.net (elo@racinelaw.net)

Cc: Watkins, Betsy (Betsy.Watkins@pacificorp.com); Bell, Barry (Barry.Bell@pacificorp.com); C&T Discovery (ctdiscovery@PacifiCorp.com); Weston, Ted (Ted.Weston@pacificorp.com); Solander, Daniel (Daniel.Solander@pacificorp.com); Data Request Response Center (datareq@pacificorp.com)

2 attachments
CAPAI DR 6.docx (23.7 KB) , Attach CAPAI DR 6a.xlsx (34.6 KB)

Attached above is Rocky Mountain Power's Response to CAPAI 6 in ID PAC-E-13-04. Please let me know if you have any trouble opening the attached file(s).

Thank you,

Kaley McNay

Coordinator, Regulatory Operations

503-813-6257

CAPAI Data Request 6

Using the Company's low-income proxy group, and based on actual monthly test year data as referred to in Request No.4, please make the following rate design model runs:

a. Calculate the effects on the low-income customer proxy group's monthly bills if the Company's monthly basic charge were increased from its current level to \$10, \$15 and to \$20, (assuming no changes to the existing commodity rates for the Residential class's two-tiered rate). In responding to this request, please make the requested calculations at existing rates during the test year.

b. Assuming no change to the Company's existing monthly basic charge, calculate the effects on the low-income proxy groups' monthly bills in comparison to non-low income residential customers (using test year actual monthly consumption) if the existing two-tiered rate design is changed such that the consumption amount of the first tier is increased from the existing 700 kWh summer block to 800 kWh/month, 1000 kWh and 1200 kWh. Please provide the same data for the winter block of 1000 kWh if the block were changed to 800 kWh, 1200 kWh and 1400 kWh.

Response to CAPAI Data Request 6

- a. Please refer to Attachment CAPAI DR 6a for the requested monthly bill impact analysis for the low-income customer proxy group who were under Schedule 1 in 2012.
- b. The Company has not performed the two-tiered rate design analysis requested by CAPAI. As specified in paragraph 18 of the Stipulation if CAPAI is party to the Stipulation the Company agrees to participate in a collaborative rate design process to evaluate alternatives.

Record holder: James Zhang
Sponsor: Joelle Steward